

EXHIBIT G

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

JOHNNY HA, JENNY PHAM, A/K/A
JENNY HA, AND HELEN LE,
Plaintiffs,

v.

TINA CONN,
Defendant.

Docket No. 2:20-cv-155-wks

**DEFENDANT'S RESPONSES TO PLAINTIFFS' REQUESTS FOR ADMISSION TO
TINA CONN**

Defendant in the above-captioned action, Ms. Tina Conn, by and through counsel of record Langrock Sperry & Wool, LLP, objects and responds to Plaintiffs' Requests for Admission as follows:

REQUESTS FOR ADMISSIONS

1. Admit that Video #1 is genuine.

ANSWER: Admit.

2. Admit that you published Video #1 to YouTube and/or to the Internet.

ANSWER: Admit.

3. Admit that Video #1 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

4. Admit that it is you speaking in Video #1.

ANSWER: Admit.

5. Admit that it is you visible in Video #1.

ANSWER: Admit.

6. Admit that Video #1 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

7. Admit that the Vietnamese-to-English translation of Video #1 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

8. Admit that the Vietnamese-to-English translation of Video #1 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

9. Admit that you have no documents, communications or other evidence to support your statements in Video #1 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

10. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #1.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

11. Admit that Video #2 is genuine.

ANSWER: Admit.

12. Admit that you published Video #2 to YouTube and/or to the Internet.

ANSWER: Admit.

13. Admit that Video #2 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

14. Admit that it is you speaking in Video #2.

ANSWER: Admit.

15. Admit that it is you visible in Video #2.

ANSWER: Admit.

16. Admit that Video #2 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

17. Admit that the Vietnamese-to-English translation to Video #2 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

18. Admit that the Vietnamese-to-English translation of Video #2 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

19. Admit that you have no documents, communications or other evidence to support your statements in Video #2 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

20. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #2.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

21. Admit that Video #3 is genuine.

ANSWER: Admit.

22. Admit that you published Video #3 to YouTube and/or the internet.

ANSWER: Admit.

23. Admit that Video #3 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

24. Admit that it is you speaking in Video #3.

ANSWER: Admit.

25. Admit that it is you visible in Video #3.

ANSWER: Admit.

26. Admit that Vide #3 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

27. Admit that the Vietnamese-to-English translation of Video #3 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

28. Admit that the Vietnamese-to-English translation of Video #3 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

29. Admit that you have no documents, communications or other evidence to support your statements in Video #3 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

30. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #3.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

31. Admit that Video #4 is genuine.

ANSWER: Admit.

32. Admit that you published Video #4 to YouTube and/or to the Internet.

ANSWER: Admit.

33. Admit that Video #4 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

34. Admit that it is you speaking in Video #4.

ANSWER: Admit.

35. Admit that it is you visible in Video #4.

ANSWER: Admit.

36. Admit that Video #4 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

37. Admit that the Vietnamese-to-English translation of Video #4 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

38. Admit that the Vietnamese-to-English translation of Video #4 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

39. Admit that you have no documents, communications or other evidence to support your statements in Video #4 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

40. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #4.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

41. Admit that Video #5 is genuine.

ANSWER: Admit.

42. Admit that you published Video #5 to YouTube and/or to the Internet.

ANSWER: Admit.

43. Admit that Video #5 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

44. Admit that it is you speaking in Video #5.

ANSWER: Admit.

45. Admit that it is you visible in Video #5.

ANSWER: Admit.

46. Admit that Video #5 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

47. Admit that the Vietnamese-to-English translation of Video #5 in the Amended Complaint is accurate and substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

48. Admit that the Vietnamese-to-English translation of Video #5 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

49. Admit that you have no documents, communications or other evidence to support your statements in Video #5 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

50. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #5.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

51. Admit that Video #6 is genuine.

ANSWER: Admit.

52. Admit that you published Video #6 to YouTube and/or to the Internet.

ANSWER: Admit.

53. Admit that Video #6 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

54. Admit that it is you speaking in Video #6.

ANSWER: Admit.

55. Admit that it is you visible in Video #6.

ANSWER: Admit.

56. Admit that Video #6 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

57. Admit that the Vietnamese-to-English translation of Video #6 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

58. Admit that the Vietnamese-to-English translation of Video #6 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

59. Admit that you have no documents, communications or other evidence to support your statements in Video #6 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

60. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #6.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

61. Admit that Video #7 is genuine.

ANSWER: Admit.

62. Admit that you published Video #7 to YouTube and/or to the Internet.

ANSWER: Admit.

63. Admit that Video #7 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

64. Admit that it is you speaking in Video #7.

ANSWER: Admit.

65. Admit that it is you visible in Video #7.

ANSWER: Admit.

66. Admit that Video #7 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

67. Admit that the Vietnamese-to-English translation of Video #7 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

68. Admit that the Vietnamese-to-English translation of Video #7 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

69. Admit that you have no documents, communications or other evidence to support your statements in Video #7 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

70. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #7.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

71. Admit that Video #8 is genuine.

ANSWER: Admit.

72. Admit that you published Video #8 on YouTube and/or to the Internet.

ANSWER: Admit.

73. Admit that Video #8 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

74. Admit that it is you speaking in Video #8.

ANSWER: Admit.

75. Admit that it is you visible in Video #8.

ANSWER: Admit.

76. Admit that Video #8 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

77. Admit that the Vietnamese-to-English translation of Video #8 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

78. Admit that the Vietnamese-to-English translation of Video #8 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

79. Admit that you have no documents, communications or other evidence to support your statements in Video #8 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint

80. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #8.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

81. Admit that Video #9 is genuine.

ANSWER: Admit.

82. Admit that you published Video #9 to YouTube and/or to the Internet.

ANSWER: Admit.

83. Admit that Video #9 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

84. Admit that it is you speaking in Video #9.

ANSWER: Admit.

85. Admit that it is you visible in Video #9.

ANSWER: Admit.

86. Admit that Video #9 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

87. Admit that the Vietnamese-to-English translation of Video #9 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

88. Admit that the Vietnamese-to-English translation of Video #9 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

89. Admit that you have no documents, communications or other evidence to support your statements in Video #9 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

90. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #9.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

91. Admit that Video #10 is genuine.

ANSWER: Admit.

92. Admit that you published Video #10 to YouTube and/or to the Internet.

ANSWER: Admit.

93. Admit that Video #10 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

94. Admit that it is you speaking in Video #10.

ANSWER: Admit.

95. Admit that it is you visible in Video #10.

ANSWER: Admit.

96. Admit that Video #10 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

97. Admit that the Vietnamese-to-English translation of Video #10 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

98. Admit that the Vietnamese-to-English translation of Video #10 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

99. Admit that you have no documents, communications or other evidence to support your statements in Video #10 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

100. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #10.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

101. Admit that Video #11 is genuine.

ANSWER: Admit.

102. Admit that you published Video #11 to YouTube and/or to the Internet.

ANSWER: Admit.

103. Admit that Video #11 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

104. Admit that it is you speaking in Video #11.

ANSWER: Admit.

105. Admit that it is you visible in Video #11.

ANSWER: Admit.

106. Admit that Video #11 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

107. Admit that the Vietnamese-to-English translation of Video #11 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

108. Admit that the Vietnamese-to-English translation of Video #11 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

109. Admit that you have no documents, communications or other evidence to support your statements in Video #11 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

110. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #11.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

111. Admit that Video #12 is genuine.

ANSWER: Admit.

112. Admit that you published Video #12 to YouTube and/or to the Internet.

ANSWER: Admit.

113. Admit that Video #12 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

114. Admit that it is you speaking in Video #12.

ANSWER: Admit.

115. Admit that it is you visible in Video #12.

ANSWER: Admit.

116. Admit that Video #12 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

117. Admit that the Vietnamese-to-English translation of Video #12 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

118. Admit that the Vietnamese-to-English translation of Video #12 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

119. Admit that you have no documents, communications or other evidence to support your statements in Video #12 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

120. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #12.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

121. Admit that Video #13 is genuine.

ANSWER: Admit.

122. Admit that you published Video #13 to YouTube and/or to the Internet.

ANSWER: Admit.

123. Admit that Video #13 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

124. Admit that it is you speaking in Video #13.

ANSWER: Admit.

125. Admit that it is you visible in Video #13.

ANSWER: Admit.

126. Admit that Video #13 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

127. Admit that the Vietnamese-to-English translation of Video #13 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

128. Admit that the Vietnamese-to-English translation of Video #13 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

129. Admit that you have no documents, communications or other evidence to support your statements in Video #13 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

130. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #13.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

131. Admit that Video #14 is genuine.

ANSWER: Admit.

132. Admit that you published Video #14 to YouTube and/or to the Internet.

ANSWER: Admit.

133. Admit that Video #14 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

134. Admit that it is you speaking in Video #14.

ANSWER: Admit.

135. Admit that it is you visible in Video #14.

ANSWER: Admit.

136. Admit that Video #14 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

137. Admit that the Vietnamese-to-English translation of Video #14 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

138. Admit that the Vietnamese-to-English translation of Video #14 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

139. Admit that you have no documents, communications or other evidence to support your statements in Video #14 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

140. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #14.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

141. Admit that Video #15 is genuine.

ANSWER: Admit.

142. Admit that you published Video #15 to YouTube and/or to the Internet.

ANSWER: Admit.

143. Admit that Video #15 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

144. Admit that it is you speaking in Video #15.

ANSWER: Admit.

145. Admit that it is you visible in Video #15.

ANSWER: Admit.

146. Admit that Video #15 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

147. Admit that the Vietnamese-to-English translation of Video #15 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

148. Admit that the Vietnamese-to-English translation of Video #15 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

149. Admit that you have no documents, communications or other evidence to support your statements in Video #15 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

150. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #15.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

151. Admit that Video #16 is genuine.

ANSWER: Admit.

152. Admit that you published Video #16 to YouTube and/or to the Internet.

ANSWER: Admit.

153. Admit that Video #16 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

154. Admit that it is you speaking in Video #16.

ANSWER: Admit.

155. Admit that it is you visible in Video #16.

ANSWER: Admit.

156. Admit that Video #16 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

157. Admit that the Vietnamese-to-English translation of Video #16 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

158. Admit that the Vietnamese-to-English translation of Video #16 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

159. Admit that you have no documents, communications or other evidence to support your statements in Video #16 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

160. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #16.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

161. Admit that Video #17 is genuine.

ANSWER: Admit.

162. Admit that you published Video #17 to YouTube and/or to the Internet.

ANSWER: Admit.

163. Admit that Video #17 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

164. Admit that it is you speaking in Video #17.

ANSWER: Admit.

165. Admit that it is you visible in Video #17.

ANSWER: Admit.

166. Admit that Video #17 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

167. Admit that the Vietnamese-to-English translation of Video #17 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

168. Admit that the Vietnamese-to-English translation of Video #17 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

169. Admit that you have no documents, communications, or other evidence to support your statements in Video #17 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

170. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #17.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

171. Admit that Video #18 is genuine.

ANSWER: Admit.

172. Admit that you published video #18 to YouTube and/or to the Internet.

ANSWER: Admit.

173. Admit that Video #18 is or was available on YouTube and/or the Internet for persons other than Plaintiffs and you to view and hear.

ANSWER: Admit.

174. Admit that it is you speaking in Video #18.

ANSWER: Admit.

175. Admit that it is you visible in Video #18.

ANSWER: Admit.

176. Admit that Video #18 was heard and/or viewed by persons other than Plaintiffs and you.

ANSWER: Objection; calls for speculation and information outside of Ms. Conn's custody, possession, or control. Subject to and without waiver of these objections, denied.

177. Admit that the Vietnamese-to-English translation of Video #18 in the Amended Complaint is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

178. Admit that the Vietnamese-to-English translation of Video #18 included in the Exhibit to the April 28, 2021 Expert Report of Thi Ngoc Son Dang is accurate or substantially accurate.

ANSWER: Denied; Ms. Conn is not qualified or certified to opine on the accurateness of an English translation, and she cannot speak English at a level that would allow her to determine whether the translate is accurate or substantially accurate.

179. Admit that you have no documents, communications or other evidence to support your statements in Video #18 that are quoted in the Amended Complaint.

ANSWER: Denied; Ms. Conn is not a certified translator and she cannot speak English at a level that would allow her to understand the quoted language in the Amended Complaint.

180. Admit that you do not have a legal privilege to publish to persons other than Plaintiffs the statements you made in Video #18.

ANSWER: Denied. Ms. Conn has legal privileges such as attorney-client, spousal communication privilege, doctor-patient privilege.

181. Admit that you have no documents or communications that support or otherwise relate to your affirmative defense of “Consent.”

ANSWER: Denied.

182. Admit that you have no documents or communications that support or otherwise relate to your affirmative defense of “Unclean hands.”

ANSWER: Denied.

183. Admit that you have no documents or communications that support or otherwise relate to your affirmative defense of “Truth.”

ANSWER: Denied.

DATED at Burlington, Vermont this 6th day of July, 2023.

Tina Conn

As to objections:

LANGROCK SPERRY & WOOL, LLP

A handwritten signature in black ink, appearing to read "Justin G. Sherman", is written over a light gray dotted rectangular background.

Justin G. Sherman
210 College Street, Suite 400
Burlington, VT 05401
jsherman@langrock.com
Phone: 802-864-0217

Attorneys for Defendant Tina Conn

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